

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

GILBERT JAMES	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:11cv221
	)	
ENCORE CAPITAL GROUP, INC., et als.	)	
	)	
Defendants.	)	

**PLAINTIFF’S MOTION TO FILE DOCUMENTS UNDER SEAL**

Plaintiff, Gilbert James, by counsel, and pursuant to Rule 5 of the Local Rules of the United States District Court for the Eastern District of Virginia and a protective order filed August 12, 2011 (Docket 37) (hereafter “the Protective Order”), hereby move to file certain documents under seal. Plaintiff has filed various discovery motions which each rely upon the events that occurred during the depositions of Gregory Call, Rita Melconian, and Nancy Kohls to some degree. While Plaintiff disagrees that much of the deposition testimony contained herein is properly designated as Confidential or could otherwise satisfy the high standard required in this District for sealing, Plaintiff seeks to file the deposition transcripts under seal pursuant to the terms of this Court’s Protective Order, until such time as the Defendants’ designations may be ruled upon.

WHEREFORE, Plaintiff respectfully request that the Court grant the Plaintiff’s Motion to File Documents Under Seal pursuant to the stipulated Protective Order.

Respectfully submitted,  
**GILBERT JAMES**

By: \_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of December, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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